

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WISCONSIN

In Re: Chris J. Hackbart,

Debtor.

CASE NO: 1-16-13658-13-CJF
Chapter 13

**NOTICE OF MOTION FOR RELIEF FROM STAY WITH IN REM RELIEF FOR
REAL PROPERTY LOCATED AT N3297 OSTEGO ROAD, RIO, WISCONSIN, 53960**

Creditor Rushmore Loan Management Services, LLC, by and through their attorneys of record, BP Peterman Law Group, LLC, has filed papers to request that the Court for an order: (1) terminating, annulling or modifying the automatic stay of section 362(e) and 1301(a) of the Bankruptcy Code, to permit Rushmore Loan Management Services, LLC to exercise its contractual and state law right to foreclosure its lien against the Debtor's real property located at N3297 Ostego Road, Rio, WI 53960 (the "Property") and to schedule a Sheriff Sale of the Property; and (2) confirming that the relief requested herein shall be binding in any other case under the Bankruptcy Code file by the Debtor or any other person claiming an interest in the Real Property. (Docket No. 27) in accordance with Bankruptcy Rules 4001, 9013, and 9014 and 4001, 9013, and 9014.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. (if you do not have an attorney, you may wish to consult one.)

If you do not want the Court to stay the Order sought by Movant in this Motion, or if you want the Court to consider your views on this Motion , then, **within fourteen (14) days of the**

date of this Notice, you or your attorney must file a written objection with the Court and request a hearing. Your objection must be sent to:

United States Bankruptcy Court
Western District of Wisconsin
120 North Henry Street, Room 340
Madison, Wisconsin 53703-2559

If you mail your objection and request for hearing to the Court for filing, you must mail it early enough so that the Court will receive it within fourteen (14) days of the date of this Notice.


You must also mail a copy of your objection and request for hearing to Movant's Attorney:

Krysta L. Kerr
BP Peterman Law Group, LLC
165 Bishops Way, Suite 100
Brookfield, WI 53005

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting the relief requested.

Dated this 21st day of December, 2016.

BP Peterman Law Group, LLC



/s/ Krysta L. Kerr, 1090070
165 Bishops Way, Suite 100
Brookfield, WI 53005
262-790-5719
262-790-5721 (fax)

Krysta L. Kerr
SRN: 1090070